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Capacity of One Woman to Carnally Abuse Another.—In *State v. Burns*, 72 Atlantic Reporter, 1083, a woman was convicted of the carnal knowledge and abuse of a girl under the age of sixteen. Pursuant to an agreement made by appellant with a male patron of her abhorrent pursuit, she procured a young girl, took her to the brothel over which she presided, and commanded her to go into a room thereof with her customer. While there the child was carnally known against her protest. Accused contended that her sex made her guilt impossible. The statute provides that "every person who shall assist, abet, counsel, cause, hire or command another to commit any offense" shall be guilty as a principal. The Connecticut Supreme Court of Errors held that a woman who abets a man in committing this offense may be prosecuted, informed against, and convicted as if she were the principal offender.

Disfigurement as Basis of Damages for Mental Suffering.—From a charge allowing the jury to consider on the subject of damages the humiliation resulting from the loss of an eye, an appeal is taken in *United States Express Co. v. Wahl*, 168 Federal Reporter, 848. The United States Circuit Court of Appeals remarking that there was a contrariety of decisions involving this point, adopted the decision of the Supreme Court in *McDermott v. Severe*, 26 Supreme Court Reporter, 709, and allowed a recovery. Where mental suffering producing embarrassment or humiliation as the result of the absence of a facial constituent is a direct and necessary consequence of the physical injury, its submission to the jury is proper.

Loss of Homestead by Divorce of Wife.—The North Dakota statute allows the head of a family a homestead exemption. One Holcomb, the owner of land there, was unfortunate enough to have a suit by his wife for divorce sustained and the custody of his only child awarded to her. For four days after the entry of this decree he lingered, and then passed beyond the jurisdiction of temporal courts. His creditors sought to exclude the child from a homestead right in his father's land. The North Dakota Supreme Court in *Holcomb v. Holcomb et al.*, 120 Northwestern Reporter, 547, held that by the judgment in the divorce suit the family ties were severed, and that H. became a single person, and ceased to be the head of a family. The husband having possessed no homestead right in the premises, none could descend to his minor son.

Injury to Automobile at Crossing.—The duty of an automobile driver to stop, look, and listen before attempting to cross a railroad track is discussed by the Circuit Court of Appeals for the Third circuit in *New York Cent. & H. R. R. Co. v. Maidment*, 168 Federal Reporter, 21. Maidment, plaintiff in the lower court, while automo-